

STATE OF ILLINOIS)		
)	ss.	AFFIDAVIT OF MERIT OF
COUNTY OF COOK)		Brian E. Thomas, M.D.

NOW COMES AFFIANT, Brian Thomas, M.D., and being first duly sworn,
deposes and avers as follows:

1. I have personal knowledge of the facts contained within this affidavit.

2. I am a physician licensed to practice medicine in the State of Illinois. I am board certified in psychiatry and board eligible in neurology.

3. I spend more than 50% of my professional time in the active clinical practice of medicine and/or teaching at an accredited university.

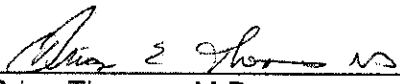
4. By virtue of my education, training, and experience, I am familiar with the standard(s) of care applicable to the medical, mental health and psychiatric evaluation and treatment, including the classification and housing of jail detainees.

5. I have reviewed all medical and jail records reasonably available in connection with Antony Jones' evaluations and care at the Summit County Jail. I have also reviewed certain medical records for Mr. Jones from Portage Path Behavioral Health and Akron General Medical Center.

6. It is my conclusion that the medical staff (Defendants identified in the Complaint) at the Summit County Jail, including, but not limited to Jeffrey Khan, M.D. and his supervisors, if any, breached the applicable standards of care in their medical, mental health and psychiatric evaluation and care, and classification and housing of Antony Jones at the Summit County Jail.

7. It is my professional conclusion to a reasonable degree of medical certainty that the aforementioned breaches in the applicable standards of care proximately caused Antony Jones injury and led to his death.

FURTHER AFFIANT SAYETH NAUGHT.


Brian Thomas, M.D.

Subscribed hereto in my presence this 25th day of July, 2018.


Notary Public

